

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

TELECO, INC., WILLIAM M. ROGERS,
and WILLIAM “BILLY” MICHAEL
ROGERS II,

Plaintiffs,
vs.

BRETT MUTOLO,

Defendant.

and

BRETT MUTOLO,

Counterclaimant and
Third-Party Plaintiff,

v.

TELECO, INC., WILLIAM M. ROGERS,
and WILLIAM “BILLY” MICHAEL
ROGERS II,

Counterclaim
Defendants,

and

ROGERS FAMILY INVESTMENTS, LLC,
NEW ERA ASSET MANAGEMENT, LLC,
REAL ESTATE UNLIMITED, LLC, WMR
& FAMILY, LLC, BOB ROGERS, and
COLIN ROGERS,

Third-Party
Defendants.

Civil Action No. 6:23-cv-03563-DCC

**PLAINTIFFS’ BRIEF CLARIFYING
THE ORGANIZATIONAL
STRUCTURE OF TELECO, INC.**

Plaintiffs TELECO, Inc. (“TELECO”), William M. Rogers (“Bill Rogers” or “Mr. Rogers”) and William “Billy” Michael Rogers II (“Billy”) (collectively, “Plaintiffs”), by and through their undersigned counsel of record, hereby file this brief clarifying the organizational structure of TELECO.

On June 11, 2025, the Honorable Donald C. Coggins entered an Order on various pending motions in this matter. (ECF No. 206, the “Order.”) In the Order, the Court noted that while TELECO was often referred to as a corporation, including in the caption of Plaintiffs’ Second Amended Complaint, in one instance, TELECO was referred to as a “limited liability corporation”. (Order at n.5; ECF No. 140 at 10.) Therefore, the Court directed Plaintiffs to clarify the organizational structure of TELECO as a business entity within ten (10) days of the Court’s Order. (Order at n.5.)

Pursuant to the Court’s direction, Plaintiffs file the instant brief, and state as follows:

TELECO, Inc. is a privately held corporation. It is incorporated in the State of South Carolina, and its principal place of business is also in South Carolina (430 Woodruff Road, Suite 300, Greenville, SC 29607). TELECO was incorporated in 1981, and Plaintiff Billy Rogers currently serves as its registered agent.

Plaintiffs attach hereto as **Exhibit A**, a Certificate of Existence from the South Carolina Secretary of State’s office, confirming the information provided above. Plaintiffs further attach hereto as **Exhibit B**, a screenshot of the Secretary of State’s Business Entities Online search feature, detailing further information regarding TELECO.

Plaintiffs believe this information fully responds to the Court’s inquiry; however, if the Court necessitates any further information regarding TELECO, Plaintiffs will provide additional information as directed by the Court.

Respectfully submitted,

LITTLER MENDELSON, P.C.

/s/ William H. Foster

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